

TALG, NV, LTD.

Ismail Amin (NV Bar No. 9343)
Marian L. Massey (NV Bar No. 14579)
Jaklin Guyumjyan, Esq. (16245)
5852 S. Durango Dr., Suite 105
Las Vegas, NV 89113
Telephone: (702) 954-3861
Facsimile: (949) 266-8406
iamin@talglaw.com
mmassey@talglaw.com

PROSKAUER ROSE LLP

Elise M. Bloom (*admitted pro hac vice*)
Michelle A. Annese (*admitted pro hac vice*)
Jordan B. Glassberg (*admitted pro hac vice pending*)
Eleven Times Square
New York, New York 10036-8299
Tel.: (212) 969-3000
Fax: (212) 969-2900
ebloom@proskauer.com
mannese@proskauer.com
jglassberg@proskauer.com

Attorneys for Defendant WNBA, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DEARICA HAMBY, an Individual,

Plaintiff,

v.

WNBA, LLC and LAS VEGAS BASKETBALL
L.P. d/b/a LAS VEGAS ACES,

Defendants.

Case No.: 2:24-cv-01474-APG-DJA

**STIPULATION AND ORDER TO STAY
DISCOVERY PENDING THE PARTIES'
PARTICIPATION IN THE EARLY
NEUTRAL EVALUATION PROGRAM**

(FIRST REQUEST)

Plaintiff DEARICA HAMBY (“Plaintiff”), and Defendant WNBA, LLC (“WNBA”), and Defendant LAS VEGAS BASKETBALL L.P. d/b/a LAS VEGAS ACES (collectively, “Defendants”) (together, Plaintiff and Defendants are referred to herein as the “Parties”), by and through their respective counsel of record, hereby stipulate that all discovery deadlines and obligations, with the exception of initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1)(A), be stayed until

February 11, 2025, which is fourteen (14) days following the parties participation in the Early Neutral Evaluation (the “ENE”) conference presently scheduled for January 28, 2025. The parties further agree that if the matter does not resolve at the ENE conference, they shall revisit the issue of a stay of discovery pending resolution of Defendants’ pending Motions to Dismiss (ECF Nos. 12 and 14) and Plaintiff’s pending Countermotion for Leave to File a First Amended Complaint (ECF No. 32) following the conclusion of the ENE, but, in any event, no later than February 11, 2025. The WNBA expressly reserves, and does not waive, all rights to file a motion to stay discovery if this matter does not resolve at the ENE and if the parties are unable to agree to a further stay of discovery pending resolution of the pending motions to dismiss.

The Parties agree that good cause exists to stay discovery until after the Parties participate in the ENE to promote efficiency and to avoid unnecessary costs, both in time and monetary costs.

For these reasons, the Parties respectfully request that the Court enter an Order staying all discovery, with the exception of initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1)(A), until February 11, 2025. The Parties agree to exchange initial disclosures by December 16, 2025.

IT IS SO STIPULATED.

DATED this 26th day of November, 2024.

DATED this 26th day of November, 2024.

PROSKAUER ROSE LLP

HKM EMPLOYMENT ATTORNEYS LLP

/s/ Elise M. Bloom

/s/ Dana Sniegocki

Elise M. Bloom (*Admitted Pro Hac Vice*)
Michelle A. Annese (*Admitted Pro Hac Vice*)
Jordan B. Glassberg (*Admitted Pro Hac Vice*)
Eleven Times Square
New York, New York 10036-8299
Tel.: (212) 969-3000
Fax: (212) 969-2900
ebloom@proskauer.com
mannese@proskauer.com
jglassberg@proskauer.com

Dana Sniegocki, Esq. (NV Bar No. 11715)
Erin S. Norgaard, Esq. (*Admitted Pro Hac Vice*)
Artur Davis, Esq. (*Admitted Pro Hac Vice*)
101 Convention Center Dr., Suite 600
Las Vegas, Nevada 89109
Tel: (702) 805-8340
Fax: (702) 805-8340
dsniegocki@hkm.com
enorgaard@hkm.com
adavis@hkm.com
Attorneys for Plaintiff

-- and --

TALG, NV, Ltd.

Ismail Amin, Esq. (NV Bar No. 9343)
Marian L. Massey, Esq. (NV Bar No. 14579)
5852 S. Durango Dr, Suite 105
Las Vegas, NV 89113
Tel.: (702) 954-3861
Fax: (949) 266-8406
iamin@talglaw.com
mmassey@talglaw.com

Attorneys for Defendant WNBA, LLC


DATED this 26th day of November, 2024.

HOLLAND & HART LLP

/s/ Dora V. Lane
Gregory S. Gilbert, Esq. (NV Bar No. 6310)
Dora V. Lane, Esq. (NV Bar No. 8424)
Erica C. Medley, Esq. (NV Bar No. 13959)
9555 Hillwood Drive, 2nd Floor
Las Vegas, NV 89134
Phone: 702.669.4600
Fax: 702.669.4650
gsgilbert@hollandhart.com
dlane@hollandhart.com
ecmedley@hollandhart.com

*Attorneys for Defendant Las Vegas
Basketball, L.P.*

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 11/27/2024